

PAUL B. BRICKFIELD**
pbrickfield@brickdonlaw.com

JOSEPH R. DONAHUE*
jdonahue@brickdonlaw.com

of counsel
NANCY J. SCAPPATICCI
nscappaticci@brickdonlaw.com

SANDRA COIRA
scoira@brickdonlaw.com

*CERTIFIED CRIMINAL TRIAL LAWYER - NEW JERSEY
† MEMBER OF NEW YORK BAR



NEW YORK OFFICE
PAUL B. BRICKFIELD P.C.
219 WESTCHESTER AVENUE
SUITE 200
PORT CHESTER, N.Y. 10573
(914) 935-9705

April 30, 2021

Via ECF Only

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-GHW

Dear Judge Woods:

I represent Edward Shin in the above-referenced matter. As the Court may recall, I suggested that the Government and the defendant present to the Court a joint proposed set of jury instructions that incorporates the Government's proposed requests, along with the defense's proposed requests in one document. Your Honor indicated that we should submit this by Monday, May 3, 2021.

We are jointly requesting that the time for the proposed joint submission be extended to Friday, May 7, 2021. The parties have been working on the jury instructions and are requesting additional time so as to finalize the submission.

Accordingly, I am requesting that the time be extended to Friday, May 7, 2021.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

cc: Robert Basil, Esq. (via ECF only)
Assistant U.S. Attorney Tara LaMorte (via ECF only)
Assistant U.S. Attorney Anden Chow (via ECF only)
Assistant U.S. Attorney Sarah Mortazavi (via ECF only)